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April 5, 2017

VIA: ECF Filing

Honorable Gary R. Brown
United States Magistrate Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722-9014

RE: *Rakeman, et al. v. MLD Mortgage Inc., et al.*; 16-CV-00453 (JFB)(GRB)

Honorable Sir:

This office represents the Plaintiffs in the above-referenced matter. Pursuant to Section III(B) of Your Honor's Individual Practice Rules, kindly accept this correspondence as the Plaintiffs' response and partial opposition to the March 30, 2017 letter motion of Defendants' counsel, Thomas D. Gearon, Esq., to be relieved as counsel. [D.E. 24].

The Plaintiffs only oppose the portion of the letter motion in which Defendants request that the Court issue an Order staying the proceedings for sixty (60) days. A sixty-day stay of the proceedings is not warranted and would only result in further prejudice to the Plaintiffs who have already experienced undue delay, through no fault of their own, in moving forward with the Settlement Conference and discovery in this action. Further, it is my understanding that Defendants have already retained substitute counsel. As such, Defendants do not need any longer than the customary thirty-day period as an accommodation.

Accordingly, the Plaintiffs respectfully request that the Court deny the portion of Defendants' letter motion seeking a sixty-day stay of these proceedings.

We thank the Court for its time and attention to this matter.

Respectfully submitted,


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